

Patrick Au, State Bar No. 174327
pau@bremerwhyte.com
Laura L. Bell, State Bar No. 134276
lbell@bremerwhyte.com
BREMER WHYTE BROWN & O'MEARA LLP
21271 Burbank Boulevard
Suite 110
Woodland Hills, California 91367
Telephone: (818) 712-9800
Facsimile: (818) 712-9900

Attorneys for Defendants,
FRANK FERRARA; CHARLIE FERRARA

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DISTRICT

CORY SPENCER, an individual; DIANA
MILENA REED, an individual;
COASTAL PROTECTION RANGERS,
INC. et al,

Plaintiff,

vs.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but not
limited to SANG LEE, BRANT
BLAKEMAN, ANGELO FERRARA,
FRANK FERRARA, CHARLIE
FERRARA, et al,

Defendants.

Case No. 2:16-cv-2129

Judge: Hon. S. James Ontero
Dept: 1

**RULE 26(A) INITIAL
DISCLOSURES BY DEFENDANTS
FRANK FERRARA AND
CHARLIE FERRARA**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendants, FRANK FERRARA and CHARLIE FERRARA ("Defendants") submit the following initial disclosures:

1. **Witnesses**. The name and, if known, the address and telephone number of each individual likely to have discoverable information, along with the subjects of that information, that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Defendants have denied the factual allegations in the Complaint. Based on present information reasonably available, Defendants initially disclose:

<u>Name of Individual</u>	<u>Contact Information</u>	<u>Subject Matter</u>
Frank Ferrara	Contacted through counsel	Factual allegations
Charlie Ferrara	Contracted through counsel	Factual allegations

2. Documents. A copy, or a description by category and location, of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Defendants have denied the factual allegations in the Complaint. Based on present information reasonably available, Defendants initially disclose:

<u>Category</u>	<u>Location</u>
No documents at this time.	

Pursuant to Rule 26(e), Defendants will supplement this disclosure as necessary.

Dated: November 29, 2016

BREMER WHYTE BROWN & O'MEARA
LLP

By: 

Patrick Au, Esq.
Laura L. Bell, Esq.
Attorneys for Defendants,
FRANK FERRARA; CHARLIE
FERRARA

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 21271 Burbank Boulevard, Suite 110, Woodland Hills, California 91367.

On November 29, 2016, I served the within document(s) described as: **DEFENDANT, FRANK FERRARA AND CHARLIE FERRERA'S RULE 26(A) INITIAL DISCLOSURES BY DEFENDANTS FRANK FERRARA AND CHARLIE FERRARA** on the interested parties in this action as stated on the attached mailing list.

☒ (BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth on the attached mailing list. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this Firm's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Woodland Hills, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (BY ELECTRONIC MAIL SERVICE) Based on OCSC Local Rule 352 and CRC Rule 2.251(c)(2) or an agreement of the parties to accept electronic service, I caused the document(s) to be sent to the person(s) at the electronic service address indicated on the attached mailing list.

Executed on November 29, 2016, at Woodland Hills, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Shawn Reutter
(Type or print name)


(Signature)

Cory Spencer v. Lunada Bay Boys et al.,**Case No. 2:16-cv-2129-SJO****BWB&O CLIENT: Frank and Charlie Ferrara**
BWB&O FILE NO.: 1178.176**SERVICE LIST****Samantha Wolff, Esq.**
HANSON BRIDGETT
425 Market Street
26th Floor
San Francisco, CA 94105
(415) 777-3200
(415) 541-9366 Fax
Attorneys For **PLAINTIFF**swolff@hansonbridgett.com**Tyson M. Shower, Esq.**
HANSON BRIDGETT
500 Capitol Mall
Suite 1500
Sacramento, CA 95814
(916) 442-3333
(916) 442-2348 Fax
Attorneys For **PLAINTIFFS**tshower@hansonbridgett.com**Victor Otten, Esq.**
OTTEN LAW, PC
3620 Pacific Coast Highway
Suite 100
Torrance, CA 90505
(310) 378-8533
(310) 347-4225 Fax
Attorneys For **PLAINTIFFS**vic@ottenlawpc.com**Jacob Song, Esq.**
KUTAK ROCK LLP
5 Park Plaza
Suite 1500
Irvine, CA 92614
(949) 417-0999
(949) 417-5639
Attorney For **CITY OF PALOS VERDES ESTATES and JEFF KEPLEY, in his representative capacity, serves as the Chief of Police Department of Defendant City of Palos Verdes Estates.**jacob.song@kutakrock.com**J. Patrick Carey, Esq.**
LAW OFFICE OF PATRICK CAREY
1230 Rosecrans Avenue
Suite 300
Manhattan Beach, CA 90266
(310) 526-2237
(310) 526-2237 Fax
Attorney For **ALAN JOHNSTON individual member of LUNADA BAY BOYS aka JALIAN JOHNSTON****Aaron G. Miller, Esq.**
THE PHILIPS FIRM
800 Wilshire Boulevard
Suite 1550
Los Angeles, CA 90017
(213) 244-9913
(213) 244-9915 Fax
Attorneys For **ANGELO FERRARA**amiller@thephillipsfirm.com**Mark Fields, Esq.**
LAW OFFICES OF MARK C. FIELDS
333 So. Hope Street
Suite 3500
Los Angeles, CA 90071
(213) 617-5225
(213) 629-2420 Fax
Attorney For **ANGELO FERRARA an individual member of LUNADA BAY BOYS and N.F. an individual member of LUNADA BAY BOYS**fields:markfieldslaw.com**Peter R. Haven, Esq.**
HAVEN LAW
1230 Rosecrans Avenue
Suite 300
Manhattan Beach, CA 90266
(310) 272-5353
(213) 477-2137 Fax
Attorneys For **MICHAEL RAY PAPAYANS**peter@havenlaw.com**Dana Alden Fox, Esq.**
LEWIS BRISBOIS BISGAARD & SMITH, LLP
633 W. 5th Street
Site 4000
Los Angeles, CA 90071
(213) 580-3858
(213) 250-7900 Fax
Attorneys For **SANG LEE**Dana.Fox@lewisbrisbois.com

1 Robert S. Cooper, Esq.
 2 **BUCHALTER NEMER,**
APC
 3 1000 Wilshire Boulevard
 Suite 1500
 Los Angeles, CA 90017
 4 (213) 891-5230
 (213) 896-0400 Fax
 5 Attorneys for **BRANT**
BLAKEMAN

6 rcooper@buchalter.com

Peter Crossin, Esq.
VEATCH CARLSON, LLP.
 1055 Wilshire Boulevard
 11th Floor
 Los Angeles, CA 90017
 (213) 381-2681
 (213) 383-6370
 Attorneys for **BRANT**
BLAKEMAN

pcrossin@veatchfirm.com

Daniel M. Crowley, Esq.
BOOTH MITCHELL &
STRANGE, LLP
 707 Wilshire Boulevard
 Suite 4450
 Los Angeles, CA 90017
 (213) 738-0100
 (213) 380-3308 Fax
 Attorneys for **SANG LEE**

dmcrowley@boothmitchel.com

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28